

Morse, Bob

From: Morse, Bob
Sent: Tuesday, April 02, 2019 4:23 PM
To: 'Battaglia, Randall W CIV USARMY CENAN (USA)'; Melissa Sweet (Melissa.Sweet@dec.ny.gov)
Cc: Briggs, James E CIV USARMY HQDA ACSIM (US); Pommerenck, Derek A CIV USARMY CEHNC (USA); Badik, Beth; Belanger, Todd; Hodges, Barry A CIV USARMY CEHNC (US); Roos, Allen D CIV USARMY CENAN (US); Pocze, Doug; Heaton, Charles H Jr CIV USARMY CEHNC (USA)
Subject: RE: PFAS ESI Workplan status

Randy,

Please explain why the submission of NYSDEC comments and the Army response cannot be pushed back a few days from April 5, if necessary. Why would this cause the postponement of May fieldwork for the ESI? Could the fieldwork not be postponed a week or more and still take place in May? What about June, early or otherwise?

It is my understanding that there are issues with sufficient groundwater levels at some SEAD sites. However, limiting groundwater sampling to a period of a few weeks in May seems unreasonable. Has this historically been the groundwater sampling window across the depot? If so, its not clear how the Army has managed to conduct groundwater sampling over the many years of investigations that have been conducted.

The ESI field work needs to be conducted this Spring.

Furthermore, what is the Army's schedule for the planned step out sampling of secondary wells? Are you saying that that sampling would have to be conducted in May 2020? If so, that is not acceptable. There is public concern as well as concern from the regulatory agencies that this and other PFAS sampling be conducted ASAP.

Please let me know. Thank you.

Bob

Bob Morse
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-----Original Message-----

From: Battaglia, Randall W CIV USARMY CENAN (USA) <Randy.W.Battaglia@usace.army.mil>
Sent: Tuesday, April 02, 2019 10:26 AM
To: Morse, Bob <Morse.Bob@epa.gov>; Melissa Sweet (Melissa.Sweet@dec.ny.gov) <Melissa.Sweet@dec.ny.gov>
Cc: Briggs, James E CIV USARMY HQDA ACSIM (US) <james.e.briggs2.civ@mail.mil>; Pommerenck, Derek A CIV USARMY CEHNC (USA) <Derek.Pommerenck@usace.army.mil>; Badik, Beth <Beth.Badik@parsons.com>; Belanger, Todd <Todd.Belanger@parsons.com>; Hodges, Barry A CIV USARMY CEHNC (US) <Barry.A.Hodges@usace.army.mil>; Roos, Allen D CIV USARMY CENAN (US) <Allen.D.Roos@usace.army.mil>; Pocze, Doug <Pocze.Doug@epa.gov>; Heaton, Charles H Jr CIV USARMY CEHNC (USA) <Charles.Heaton@usace.army.mil>

Subject: RE: PFAS ESI Workplan status

Melissa/Bob,

It was clear responses to EPA comments were adequate for the ESI.

We have scheduled the drillers for 6 May. If we do not receive NYSDEC comments and can resolve/answer them by 5 April, I will have to postpone the field work.

I cannot proceed at risk with the field work.

As I have been advised that water levels sufficient for sampling are best in early spring, postponement of the field work may be for one year to May 2020. This will certainly give enough time to address the NYSDEC comments.

My primary office phone number is now: 347-213-1565

Randy Battaglia
Project Manager
Seneca AD BRAC Environmental Coordinator/Caretaker New York District CENAN-PP-E

-----Original Message-----

From: Battaglia, Randall W CIV USARMY CENAN (USA)

Sent: Monday, April 01, 2019 12:03 PM

To: 'Morse, Bob' <Morse.Bob@epa.gov>; Melissa Sweet (Melissa.Sweet@dec.ny.gov) <Melissa.Sweet@dec.ny.gov>

Cc: Pommerenck, Derek A CIV USARMY CEHNC (USA) <Derek.Pommerenck@usace.army.mil>; Badik, Beth <Beth.Badik@parsons.com>; Belanger, Todd <Todd.Belanger@parsons.com>; Hodges, Barry A CIV USARMY CEHNC (US) <Barry.A.Hodges@usace.army.mil>; Roos, Allen D CIV USARMY CENAN (US) <Allen.D.Roos@usace.army.mil>; Pocze, Doug <Pocze.Doug@epa.gov>

Subject: RE: PFAS ESI Workplan status

Bob,

I have funding only for the ESI; no additional efforts are funded at this time.

Under CERCLA and the Army's restoration program, I can commit to performing work as needed and routinely request/program and obtain the funding. I assumed that PFAS would follow the normal process.

Noting your comments below, I need to caveat committing the Army for additional PFAS work at this time.

In discussing the ESI internally, I was informed that additional PFAS actions (and funding) involve decisions that are above the BRAC Division.

The reasons were primarily that as an emerging contaminant, there are no promulgated standards, action levels, it is not a hazardous substance, etc.

My understanding is that this may mean simply that funding is on a case by case basis, such as based upon potential for exposure.

This also does not mean that the Army will not fund additional actions. It may mean simply that it will wait until the results of the ESI.

My primary office phone number is now: 347-213-1565

Randy Battaglia
Project Manager
Seneca AD BRAC Environmental Coordinator/Caretaker New York District CENAN-PP-E

-----Original Message-----

From: Morse, Bob [mailto:Morse.Bob@epa.gov]
Sent: Friday, March 29, 2019 12:57 PM
To: Battaglia, Randall W CIV USARMY CENAN (USA) <Randy.W.Battaglia@usace.army.mil>; Melissa Sweet (Melissa.Sweet@dec.ny.gov) <Melissa.Sweet@dec.ny.gov>
Cc: Pommerenck, Derek A CIV USARMY CEHNC (USA) <Derek.Pommerenck@usace.army.mil>; Badik, Beth <Beth.Badik@parsons.com>; Belanger, Todd <Todd.Belanger@parsons.com>; Hodges, Barry A CIV USARMY CEHNC (US) <Barry.A.Hodges@usace.army.mil>; Roos, Allen D CIV USARMY CENAN (US) <Allen.D.Roos@usace.army.mil>; Pocze, Doug <Pocze.Doug@epa.gov>
Subject: [Non-DoD Source] RE: PFAS ESI Workplan status

Randy,

EPA has reviewed the final PFAS ESI Work Plan and the Army Response To Comments on the draft Work Plan.

The Army's revisions and responses are adequate for the purposes of the planned May fieldwork.

While it would be preferable that the Army conduct the requested soil and lower aquifer sampling as part of the May sampling effort, EPA notes that the Army has committed to doing that work in the future as part of additional RI fieldwork. It is EPA's understanding that the Army has also committed to conducting a depot-wide RI based on the results of a planned depot-wide PA.

Also, the Army's response to NYSDEC Comment # 5 states that a draft ESI Report is planned for submission in November 2019. In the event that the off depot well survey that is to be part of the ESI has not been completed by that time, EPA requests that the Army not hold up submission of the draft ESI Report until the well survey has been completed. If the well survey has not been completed and complied when the ESI Report is complete, it is suggested that the Army submit the well survey later as an addendum to the ESI Report.

With respect to EPA's Comment # 3 (EPA request for a well survey to be conducted on the former depot property), please provide the source the source of the information contained in the Army's response. Please note that based upon the Army's response to this question, a more formal on-depot well survey may still need to be conducted as per EPA's original request in Comment # 3.

Please let me know if you have any questions. Good luck with the proposed field work.

Bob

-----Original Message-----

From: Battaglia, Randall W CIV USARMY CENAN (USA) <Randy.W.Battaglia@usace.army.mil>
Sent: Friday, March 29, 2019 10:38 AM
To: Morse, Bob <Morse.Bob@epa.gov>; Melissa Sweet (Melissa.Sweet@dec.ny.gov) <Melissa.Sweet@dec.ny.gov>
Cc: Pommerenck, Derek A CIV USARMY CEHNC (USA) <Derek.Pommerenck@usace.army.mil>; Badik, Beth <Beth.Badik@parsons.com>; Belanger, Todd <Todd.Belanger@parsons.com>; Hodges, Barry A CIV USARMY CEHNC (US) <Barry.A.Hodges@usace.army.mil>; Roos, Allen D CIV USARMY CENAN (US) <Allen.D.Roos@usace.army.mil>
Subject: PFAS ESI Workplan status

Bob/Melissa,

As you know we submitted the response to comments and Final Workplan for the ESI on 14 February. We need to know if this is accepted or if there are additional comments or issues.

We have scheduled the ESI field work, well drillers, and sampling for May and need to know if we can proceed.

My primary office phone number is now: 347-213-1565

Randy Battaglia

Project Manager

Seneca AD BRAC Environmental Coordinator/Caretaker New York District CENAN-PP-E